

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

MIDNIGHT MADNESS DISTILLING LLC,
Debtor.

BONNIE B. FINKEL, in her capacity as Chapter 7
Trustee for Midnight Madness Distilling LLC,

Plaintiff,

v.

CASEY PARZYCH; SHAWN SHEEHAN; ANGUS
RITTENBURG; KELLY FESTA; ASHLEIGH
BALDWIN; MICHAEL BOYER; R.F. CULBERTSON;
GARY PARZYCH; RYAN USZENSKI; POLEBRIDGE,
LLC; GOOD DESIGN, INC.; AGTECH PA LLC;
AGTECH VI, LLC; XO ENERGY WORLDWIDE,
LLLP; XO EW, LLC; CAN MAN LLC; BEST BEV,
LLC; ETOH WORLDWIDE, LLC; CANVAS 340, LLC;
FINLAND LEASING CO., INC.; and EUGENE T.
PARZYCH, INC..

Defendants.

CHAPTER 7
Case No. 21-11750-MDC

Adv. No. 23-00047-MDC

JURY TRIAL DEMANDED

**NOTICE OF EMERGENCY MOTION OF MOVING DEFENDANTS FOR AN
ORDER TO STAY PROCEEDINGS AND/OR FOR OTHER RELATED RELIEF**

On September 5, 2023, Casey Parzych; Shawn Sheehan; Angus Rittenburg; Kelly A. Festa; Ashleigh Baldwin; Michael Boyer; R.F. Culbertson; Polebridge, LLC; Good Design, Inc.; AgTech PA LLC; AgTech VI, LLC; XO Energy Worldwide, LLLP; XO EW, LLC; Best Bev, LLC; Etoh Worldwide, LLC; and Canvas 340, LLC have filed the *Emergency Motion of Moving Defendants for an Order to Stay Proceedings and/or for Other Related Relief* [Adv. Proc. D.I. 6].

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).

2. **If you do not want the court to grant the relief sought in the above-referenced Motion** or if you want the court to consider your view on the Motion, then on or before **September 21, 2023, you or your attorney must file a response to the Motion.** (see *Instructions on next page*).
3. **A telephonic hearing on the Motion** is scheduled to be held on 10/4/2023 at 11:00 a.m. (ET) before Chief Judge Magdeline D. Coleman. Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing.**
4. **If you do not file a response to the Motion**, the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's Office at (215) 408-2800 or undersigned counsel to the Debtor to find out whether a hearing has been scheduled.
6. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice

Filing Instructions

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.
8. **If you are not required to file electronically**, you must file your response at:

United States Bankruptcy Court
Eastern District of Pennsylvania
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107

9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same day that you file or mail your response to the Motion, you must also mail or deliver a copy of your response to Debtor's counsel at the addresses listed below.

Date: September 7, 2023

ARCHER & GREINER, P.C.

/s/ Stephen M. Packman

Stephen M. Packman
Douglas G. Leney
Mariam Khoudari
Three Logan Square
1717 Arch Street, Suite 3500
Philadelphia, PA 19103
Phone: (215) 963-3300
Fax: (215) 963-9999
spackman@archerlaw.com
dleney@archerlaw.com
mkhoudari@archerlaw.com

Bryan J. Hall
300 Delaware Avenue, Suite 1100
Wilmington, Delaware 19801
Phone: (302) 777-4350
Fax: (302) 777-4352
bjhall@archerlaw.com